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WACHOVIA MORTGAGE, FSB
fka: World Savings Bank, FSB, its successors and/or assigns

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

In re) Case No. 09-12064
RICHARD KEVIN BELL and) Chapter 7
CONSTANCE M. BELL,) Docket Control No.: DMM-1
fdb: Telstar Utilities Construction, Inc.)
dba: Beadgang) MOTION FOR RELIEF FROM STAY
Debtors.) [Bankruptcy Rule 4001,
) Local Rule 4001-1, 9014-1]
)
BETH MAXWELL STRATTON,) Date: June 30, 2009
) Time: 1:30 p.m.
Trustee.) Judge: Whitney Rimel
) Ctrm: 11
) Place: U.S. Bankruptcy Court
) 2500 Tulare Street, Fresno, CA

TO THE COURT AND TO ALL INTERESTED PARTIES:

WACHOVIA MORTGAGE, FSB, will and hereby does move the court for an order terminating the automatic stay provisions of 11 U.S.C. §362 and permitting Movant to continue to exercise its lien enforcement rights under the deed of trust described in the accompanying declaration and for attorney's fees incurred herein.

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1 Said motion is made on grounds that debtors' estate has no realizable equity in said real
2 property, that the property is not necessary for an effective reorganization of debtors herein, and that
3 Movant is not adequately protected.

4 Furthermore, Movant specifically seeks to nullify the effect of Bankruptcy Rule 4001 (a)(3).

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6 This motion is based on the papers and pleadings on file herein, the attached Declaration of
7 Robert Martinez in Support of Motion for Relief From Stay, and the Relief From Stay Information
8 Sheet which is incorporated herein by reference.

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10 Dated: June 2, 2009

LAW OFFICES OF DAVE M. McGRAW

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12 BY:/s/ Dave M. McGraw
13 DAVE M. McGRAW
14 Attorneys for Movant
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